



DSA PROCEDURE #05-01 (Stakeholder Edition)

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To: DSA Regional Offices Staff

**From: Division of the State Architect
Department of General Services
State of California**

SUBJECT: Rapid Interpretation Process (RIP)

1. Purpose and Goal: The Rapid Interpretation Process (RIP) has been established to provide technical support to the four DSA regional offices by processing official interpretations of the California Building Code or other applicable standards, laws, or regulations. The RIP process will also enable DSA to recommend policies, regulation changes or interpretations of regulations arising out of a specific interpretation.

The process is intended to resolve issues arising with DSA's clients by accomplishing the following four goals:

- 1.1** Provide accurate, effective, and timely dispute resolution assistance by issuing project specific interpretations of regulations enforced by DSA. Interpretations are developed utilizing a discipline specific Code Interpretation Committee (CIC). The interpretations rendered by the committee represent the official position of the DSA.
- 1.2** Resolve issues by considering input from affected parties.
- 1.3** Provide answers to all affected parties. When the interpretation is likely to have broad application, the committee shall make its interpretations available to the public in order to gain consistency in design submittals.
- 1.4** Achieve consistency between Regional Offices. The committee shall make its interpretations available to all DSA staff, in order to gain consistency in future decisions made by DSA regional offices.

2. Procedure: The RIP process is described below.

Note: If at any point the client agrees with a DSA determination or DSA agrees with the client's interpretation, the process is discontinued.

2.1 Structural Safety

- 2.1.1** When a decision is made by DSA plan review or field review staff and the client does not agree, the client may ask for review by the Regional Office's supervising structural engineer.
- 2.1.2** If the client does not agree with the decision of the supervising structural engineer, the client may ask for the decision to be reviewed by the DSA Regional Office manager.

2.1.3 If the client does not agree with the decision of the DSA Regional Office manager, the client may ask the Regional Office manager for review by the DSA Headquarters Structural Safety Code Interpretation Committee (CIC). [See “Initiating a CIC Review” below]

2.1.4 The regional manager shall be responsible for clearly documenting DSA’s position on the issue, with any associated reasoning in support of such position, in addition to citing any applicable building code sections, DSA policies, or other relevant information.

2.2 Fire/Life Safety and Access Compliance

2.2.1 When a decision is made by DSA plan review or field review staff and the client does not agree, the client may ask for review by the Regional Office’s discipline lead person.

2.2.2 If the client does not agree with the decision of the discipline lead person, the client may ask the DSA Regional Office manager for the decision to be reviewed by the appropriate DSA Headquarters Fire/Life Safety or Access Compliance Code Interpretation Committee (CIC). [See “Initiating a CIC Review” below]

2.2.3 The discipline lead person/discipline supervisor shall be responsible for clearly documenting DSA’s position on the issue, with any associated reasoning in support of such position, in addition to citing any applicable building code sections, DSA policies, or other relevant information. Such documentation shall be forwarded to the regional manager. For Fire/Life Safety, documenting DSA’s position can include specific interpretations as provided by the State Fire Marshal or model code organizations. For Access Compliance, documenting DSA’s position can include specific federal guidelines, federal interpretations, or other laws that apply to persons with disabilities.

2.3 Initiating a DSA Headquarters Code Interpretation Committee (CIC) review:

2.3.1 All requests for CIC review of a DSA Regional Office decision start the same way:
All decisions appealed to the CIC will be in writing. The client shall be responsible for clearly documenting their position on the issue and include:

1. A description of the issue
2. Reasons for making the appeal of the DSA decision, with any associated reasoning in support of such position, including any applicable building code sections, DSA policies, or other relevant information
3. A specific contact person for any questions and final response.

2.3.2 Within 48 hours of receipt of the complete documentation, the Regional Manager shall forward the documentation, or other materials relevant to the issue, to the DSA Headquarters CIC, and shall notify the client that the documents have been forwarded to HQ. The DSA Regional Office is responsible for providing documentation of the DSA position.

2.3.3 All requests for interpretations, if possible, shall be written in such a form that they can be answered either “yes” or “no”. Questions not clearly phrased will be rewritten by the CIC for accuracy and conciseness. Questions addressing separate topics shall be clearly identified as such.

2.3.4 In all cases, the CIC will contact the client and the regional office to assure the question is clearly understood.

2.4 Review by the CIC

2.4.1 Processing of RIP requests is intended to provide that each request complies with these procedures, that the interpretation reflects the intent of the code, and that the interpretation is processed in a timely manner.

2.4.2 CIC interpretations are intended to clarify issues which are not addressed directly by the literal text of the California Building Code and are interpretive in nature. A request for a CIC interpretation will not be processed if it involves:

1. judgment or knowledge not readily available in the written request or which can only be acquired as a result of an on-site inspection, and
2. code text that clearly provides the requested information. The Committee will only consider project specific interpretations made through the RIP.

2.4.3 The DSA Headquarters has three discipline specific Code Interpretation Committees (CIC). These committees are:

- Structural Safety,
- Fire/Life Safety, and
- Access Compliance.

All correspondence relating to requests for committee interpretations shall be directed to the appropriate CIC for the discipline that the interpretation request applies to. In cases where the interpretation request applies to more than one discipline group, each applicable CIC shall receive correspondence relating to such request, and decisions made by each CIC are independent of one another, except when interpretation of one discipline has impact on interpretation of other discipline.

2.4.4 **CIC Leads:** Note that the leads are responsible for the makeup of the CIC:

Structural Safety CIC

The HQ Principal Structural Engineer

Fire/Life Safety CIC

The Principal FLSO HQ Principal FLSO

Access Compliance CIC

The HQ Principal Architect

2.4.5 The discipline specific CIC shall meet to discuss each RIP and reach a decision.

2.4.6 The CIC lead shall notify the requesting regional office, and a committee interpretation shall be issued to all regional offices and posted on the DSA **Intranet** site, and a copy provided to the client.

2.4.7 The CIC lead shall ensure that the decision of the CIC will be rendered in ten (10) working days or less from the date that the request was received.

2.4.8 Any client or DSA staff member can request that an existing committee interpretation be reviewed based on revisions to applicable regulations, policies, standards, federal guidelines, interpretations, or other laws that may affect the validity or accuracy of such interpretation. The committee shall follow the process above in revising the interpretation, deleting it, or denying the request for review. Any revisions to, or deletions of previously rendered interpretations shall be recorded in writing, dated, and made available to the public and to DSA staff. A record of all interpretations prior to revision, or prior to deletion, shall be maintained in DSA records.